

BATHAE DUNNE LLP
Yavar Bathaee (CA 282388)
yavar@bathaeedunne.com
Andrew C. Wolinsky (CA 45965)
awolinsky@bathaeedunne.com
445 Park Avenue, 9th Floor
New York, NY 10022
Tel.: (332) 322-8835

Brian J. Dunne (CA 275689)
bdunne@bathaeedunne.com
Edward M. Grauman (*pro hac vice*)
egrauman@bathaeedunne.com
901 South MoPac Expressway
Barton Oaks Plaza I, Suite 300
Austin, TX 78746
Tel.: (213) 462-2772

*Interim Co-Lead Counsel for the
Advertiser Classes*

SCOTT+SCOTT ATTORNEYS AT LAW LLP
Amanda F. Lawrence (*pro hac vice*)
alawrence@scott-scott.com
Patrick J. McGahan (*pro hac vice*)
pmcgahan@scott-scott.com
Michael P. Srodoski (*pro hac vice*)
msrodoski@scott-scott.com
156 South Main Street, P.O. Box 192
Colchester, CT 06415
Tel.: (860) 537-5537

Patrick J. Coughlin (CA 111070)
pcoughlin@scott-scott.com
Carmen A. Medici (CA 248417)
cmedici@scott-scott.com
Hal D. Cunningham (CA 243048)
hcunningham@scott-scott.com
Daniel J. Brockwell (CA 335983)
dbrockwell@scott-scott.com
600 W. Broadway, Suite 3300
San Diego, CA 92101
Tel.: (619) 233-4565

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Consolidated Case No. 3:20-cv-08570-JD

**DECLARATION OF AMANDA F.
LAWRENCE IN SUPPORT OF
ADVERTISER PLAINTIFFS' MOTION
TO EXCLUDE OPINIONS OF DR.
HOCHBERG**

Hearing Date: December 14, 2023
Hearing Time: 10:00 a.m.
Courtroom: 11, 19th Floor
Judge: The Honorable James Donato

1 I, Amanda F. Lawrence, declare as follows:

2 1. I am an attorney admitted pro hac vice in this action (the “Action”). I am a partner at
 3 Scott+Scott Attorneys at Law LLP, interim Co-Lead Counsel for the Advertiser Classes in the Action.
 4 I submit this declaration in support of Advertiser Plaintiffs’ Motion to Exclude the Opinions of Dr.
 5 Yael Hochberg, an expert witness retained by Meta Platforms, Inc. (“Meta”). The contents of this
 6 declaration are based on my personal knowledge, including my personal knowledge of the documents
 7 cited herein. The facts set forth herein are within my personal knowledge and if called as a witness,
 8 I could and would competently testify to them.

9 2. Attached hereto as **Exhibit 1** is a true and correct copy of Meta’s Expert Report of
 10 Yael Hochberg, Ph.D. Errata, dated August 25, 2023 and marked Plaintiffs’ Deposition Exhibit 2509.

11 3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the transcript
 12 of the September 19, 2023 deposition of Yael Hochberg.

13 4. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from *The Sedona*
 14 *Conference on the Role of Economics in Antitrust Law*, 7 SEDONA CONF. J. 69 (2006)

15 5. Attached hereto as **Exhibit 4** is a true and correct copy of Richard Schmalensee,
 16 *Standards for Dominant Firm Conduct: What Can Economics Contribute?*, THE ECONOMICS OF
 17 MARKET DOMINANCE (1985).

18 6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from Dennis W.
 19 Carlton & Jeffrey M. Perloff, *Modern Industrial Organization* (4th ed. 2005).

20 7. Attached hereto as **Exhibit 6** is a true and correct copy of Franklin M. Fisher,
 21 *Economic Analysis and ‘Bright-Line’ Tests*, 4 J. OF COMPETITION L. AND ECONS. 1 (2007), a document
 22 produced by Meta in this litigation.

23 8. Attached hereto as **Exhibit 7** is a true and correct copy of Advertiser Plaintiffs’ Expert
 24 Report of Michael A. Williams, Ph.D., dated July 7, 2023 and marked Plaintiffs’ Deposition Exhibit
 25 2510.

26 9. Attached hereto as **Exhibit 8** is a true and correct copy of Advertiser Plaintiffs’ Expert
 27 Reply Report of Kevin Kreitzman, dated September 15, 2023 and marked Plaintiffs’ Deposition
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1 Exhibit 2513.

2 10. Attached hereto as **Exhibit 9** is a true and correct copy of Advertiser Plaintiffs' Expert
3 Reply Report of Michael A. Williams, Ph.D., dated September 15, 2023.

4 I declare under penalty of perjury under the laws of the United States of America that the
5 foregoing is true and correct. Executed on this 6th day of October, 2023 at Colchester, Connecticut.

6
7 /s/Amanda F. Lawrence

8 Amanda F. Lawrence
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10 **CERTIFICATE OF SERVICE**

11 I hereby certify that on October 6, 2023, I caused a true and correct copy of the foregoing
12 document to be served by electronic mail on all counsel of record.

13 Dated: October 6, 2023

By: /s/Amanda F. Lawrence

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